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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY – CAMDEN DIVISION

Case No.: 14-20604-ABA

REQUEST FOR SPECIAL NOTICE

PLEASE TAKE NOTICE that GHIDOTTI|BERGER, LLP, attorneys for US Trust Bank National Association, as Trustee of the Igloo Series III Trust C/O BSI Financial Services hereby requests special notice of all events relevant to the above referenced bankruptcy and copies of all pleadings or documents filed in relation to the above referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which

1 must be noticed to creditors, creditors' committees and parties-in-interest and other notices as
2 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
3 referenced bankruptcy court.

4 GHIDOTTI|BERGER, LLP, requests that for all notice purposes and for inclusion in
5 the Master Mailing List in this case, the following address be used:

6 GHIDOTTI|BERGER, LLP
7 1920 Old Tustin Ave.
8 Santa Ana, CA 92705
9 Telephone (949) 427-2010 – Fax: (949) 427-2732
ecfnotifications@ghidottiberger.com

10 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
11 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
12 waiver of the within party's:

13 a. Right to have any and all final orders in any and all non-core matters entered
14 only after de novo review by a United States District Court Judge;

15 b. Right to trial by jury in any proceeding as to any and all matters so triable
16 herein, whether or not the same be designated legal or private rights, or in any case,
17 controversy or proceeding related hereto, notwithstanding the designation or not of such
18 matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial
19 right is pursuant to statute or the United States Constitution;

20 c. Right to have the reference of this matter withdrawn by the United States
21 District Court in any matter or proceeding subject to mandatory or discretionary withdrawal;
22 and

23 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
24 which this party is entitled under any agreements at law or in equity or under the United States
25 Constitution.

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1 All of the above rights are expressly reserved and preserved by this party without
2 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
3 or by any other participation in these matters.

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5
6 Dated: February 6, 2019

GHIDOTTI|BERGER LLP.

By: /s/ Kristin A. Zilberstein

Kristin A. Zilberstein, Esq.

Attorneys for BSI Financial Services as servicer
for U.S. Bank Trust National Association, as
trustee of the Igloo Series III Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY – CAMDEN DIVISION

In Re: HECTOR J. MERCADO

Case No.: 14-20604-ABA

CHAPTER 13

Debtors.

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue, Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

On February 6, 2019 I served the following documents described as:

• **REQUEST FOR SPECIAL NOTICE**

on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope addressed as follows:

(Via United States Mail)

Debtor

Hector J Mercado
28 N Vassar Square
Ventnor, NJ 08406

Debtor's Counsel

Steven A. Silnutzer
335 E. Jimmie Leeds Road
Building 200, Suite C
Galloway, NJ 08205

Chapter 13 Trustee

Isabel C. Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, NJ 08002

Chapter 13 Trustee's Counsel:

Isabel C. Balboa (NA)
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

Donna L. Wenzel

Office of Chapter 13 Trustee
535 Rt. 28
Suite 580
Cherry Hill, NJ 08002

xx (By First Class Mail) At my business address, I placed such envelope for deposit with the United States Postal Service by placing them for collection and mailing on that date following ordinary business practices.

 Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the Eastern District of California

xx (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 6, 2019 at Santa Ana, California

/s/ LaKeha Green

LaKeha Green